

# **EXHIBIT 9**

## **PUBLIC VERSION**

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1 UNITED STATES DISTRICT COURT  
2 CENTRAL DISTRICT OF CALIFORNIA  
3 WESTERN DIVISION

4 THE CALIFORNIA INSTITUTE  
of TECHNOLOGY,

5  
Plaintiff,

6  
vs. Case No. 2:16-cv-3714  
7 GW-AGR<sub>x</sub>

BROADCOM LIMITED, BROADCOM  
8 CORPORATION, AVAGO  
TECHNOLOGIES LIMITED, APPLE,  
9 INC., AND CYPRESS  
SEMICONDUCTOR CORPORATION,

10  
Defendants.

11  
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12  
13  
14  
15 HIGHLY CONFIDENTIAL - OUTSIDE ATTORNEYS' EYES ONLY  
16 VIDEO DEPOSITION OF [REDACTED]  
17 Palo Alto, California  
18 Friday, September 8, 2017  
19 Volume I

20  
21  
22 REPORTED BY:  
23 REBECCA L. ROMANO, RPR, CSR No. 12546  
24 JOB NO. 2670542  
25 PAGES 1 - 316

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1 THE VIDEOGRAPHER: Counsel. 08:57:56  
2  
3 [REDACTED]  
4 having been administered an oath, was examined and  
5 testified as follows: 08:57:56  
6 EXAMINATION  
7 BY MR. BIDDINGER:  
8 Q. Good morning.  
9 Could you state your full name for us,  
10 please. 08:58:00  
11 A. [REDACTED]  
12 Q. And who do you work for?  
13 A. Broadcom.  
14 Q. And what's your current position there?  
15 A. Senior director of product marketing. 08:58:08  
16 Q. And where is your office located?  
17 A. 190 Mathilda Place, Sunnyvale.  
18 Q. That's in California?  
19 A. That is correct.  
20 Q. Thank you. 08:58:22  
21 Have you had your deposition taken  
22 before?  
23 A. I didn't understand your question.  
24 Q. Have you ever been deposed before in  
25 connection with a litigation like this? 08:58:33

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1 WiFi combo chips for individual customers? 05:34:48

2 A. No.

3 MR. BIDDINGER: Objection.

4 Q. (By Mr. Dowd) Let's take the [REDACTED] --

5 sorry. Withdrawn. 05:34:54

6 Let's take the [REDACTED] as an example.

7 Do you have that in mind?

8 A. Yes.

9 Q. Does Broadcom offer that same chip to

10 customers other than Apple? 05:35:07

11 MR. BIDDINGER: Objection.

12 THE DEPONENT: Yes.

13 Q. (By Mr. Dowd) Could Samsung module

14 suppliers, for example, buy the [REDACTED]

15 MR. BIDDINGER: Objection. 05:35:16

16 THE DEPONENT: Yes.

17 Q. (By Mr. Dowd) Are you aware of whether

18 they, in fact, have done so?

19 A. Yes.

20 Q. Yes, they have? 05:35:22

21 A. Yes, they have.

22 Q. And so is it correct that the same

23 [REDACTED] is sold to -- is offered to anyone on the

24 market who wants to buy it?

25 MR. BIDDINGER: Objection. 05:35:36

1 I, Rebecca L. Romano, a Certified Shorthand  
2 Reporter of the State of California, do hereby  
3 certify:

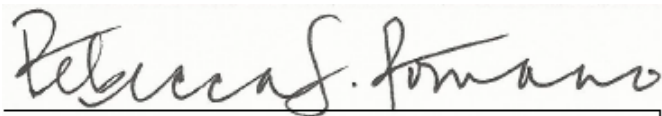
4 That the foregoing proceedings were taken  
5 before me at the time and place herein set forth;  
6 that any witnesses in the foregoing proceedings,  
7 prior to testifying, were administered an oath;  
8 that a record of the proceedings was made by me  
9 using machine shorthand which was thereafter  
10 transcribed under my direction; that the foregoing  
11 transcript is true record of the testimony given.

12 Further, that if the foregoing pertains to the  
13 original transcript of a deposition in a Federal  
14 Case, before completion of the proceedings, review  
15 of the transcript [ ] was [ ] was not requested.

16 I further certify I am neither financially  
17 interested in the action nor a relative or employee  
18 of any attorney or any party to this action.

19 IN WITNESS WHEREOF, I have this date  
20 subscribed my name.

21 Dated: September 20, 2017  
22  
23  
24

A handwritten signature in cursive script, reading "Rebecca L. Romano", is written over a horizontal line.

25 Rebecca L. Romano, RPR,  
CSR. No 12546